

1 District Judge Tana Lin  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 PANTEA NAZEMAN, *et al.*,

Case No. 2:25-cv-00080-TL

10 Plaintiffs,

STIPULATED MOTION TO HOLD  
CASE IN ABEYANCE AND  
[PROPOSED] ORDER

11 v.

12 KIKA SCOTT, *et al.*,<sup>1</sup>

Noted for Consideration:  
March 13, 2025

13 Defendants.

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15 Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal Rule  
16 of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to  
17 stay these proceedings until May 8, 2025. Plaintiffs bring this litigation pursuant to the  
18 Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S.  
19 Citizenship and Immigration Services (“USCIS”) adjudicate their Forms I-485, Applications to  
20 Register Permanent Residence or Adjust Status. Defendants’ response to the Complaint is  
21 currently due on March 24, 2025. The parties are currently working towards a resolution to this

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<sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d), Defendants substitute Senior Official Performing the Duties of  
the Director Kika Scott for Ur Jaddou.

1 litigation. For good cause, the parties request that the Court hold the case in abeyance until May  
2 8, 2025.

3 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706  
4 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to  
5 control the disposition of the causes on its docket with economy of time and effort for itself, for  
6 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.  
7 P. 1.

8 This case involves four separate Form I-485 application; however, only the applications  
9 concerning Plaintiffs Godefay and Araya, as well as Plaintiffs Ramirez Magana and Montes  
10 remain at issue. USCIS has issued a Notice of Intent to Revoke (“NOIR”) to Plaintiffs Godefay  
11 and Araya, who have until April 8, 2025, to respond. Once USCIS receives a response, it will  
12 need additional time to review the response and continue processing the application. In regard  
13 to the application concerning Plaintiffs Ramirez Magana and Montes, Plaintiffs’ counsel is  
14 seeking to terminate pending removal proceedings so that USCIS will have jurisdiction to  
15 adjudicate the Form I-485.

16 Accordingly, the parties request that the Court hold the case in abeyance until May 8,  
17 2025. The parties will submit a joint status report on or before May 8, 2025.

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1 DATED this 13th day of March, 2025.

2 Respectfully submitted,

3 TEAL LUTHY MILLER  
4 Acting United States Attorney

5 s/ Michelle R. Lambert  
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12 *Attorney for Plaintiff*

13 *Attorneys for Defendants*

14 *I certify that this memorandum contains 316*  
15 *words, in compliance with the Local Civil Rules.*

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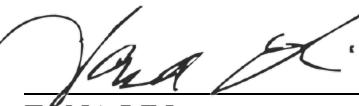
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1 **[PROPOSED] ORDER**

2 The case is held in abeyance until May 8, 2025. The parties shall submit a joint status  
3 report on or before May 8, 2025. It is so **ORDERED**.

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5 DATED this 13th day of March 2025.

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8 TANA LIN  
United States District Judge

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